

# AGNIFILO

## INTRATER

VIA ECF

The Honorable Lewis J. Liman  
United States District Judge  
Southern District of New York  
500 Pearl Street, Courtroom 15C  
New York, NY 10007

October 4, 2024  
MEMO ENDORSEMENT.

Granted in part and denied in part without prejudice to renewal. Mr. Caruso's bail is modified to permit him to travel to Delray Beach, Florida from October 5, 2024 to October 10, 2024, travelling through all intermediate points, with an itinerary to be provided to pretrial services. His passport shall be released to him solely to permit him to transfer his driver's license from Vermont to Florida and shall be returned immediately upon his return from Florida. The remainder of the requests are denied as premature, without prejudice to renewal upon Mr. Caruso renewing the requests on dates closer to the requested travel.

Re: United States v. Troy Caruso, 23 Cr. 654 (LJL) 10/4/2024 SO ORDERED.

Dear Judge Liman:



LEWIS J. LIMAN  
United States District Judge

We represent Mr. Troy Caruso in the above-captioned case and write to respectfully request that the Court modify Mr. Caruso's bail conditions to allow him to travel. Pretrial Services (Officer Jessica Aguilar-Adan) has no objection and defers to the Court.

First, we request that Mr. Caruso's passport be released to him in advance of his trip to Delray Beach, Florida from October 5, 2024, to October 10, 2024. The reason for this request is he has to transfer his driver's license from Vermont to Florida, and needs his passport to do so. Second, we request that Mr. Caruso be permitted to travel to Charleston, South Carolina from October 18, 2024, to October 21, 2024, to visit his daughter at college. Third, we request that Mr. Caruso be able to travel to the city of Buffalo, New York from November 1, 2024, to November 4, 2024, to attend a business trip.

Finally, we request that Mr. Caruso be able to travel to Italy during a December 2, 2024 through December 18, 2024. If the Court grants this request, he will provide his itinerary to Pretrial Services upon booking his travel and Pretrial Services will release Mr. Caruso's passport to him two days before travel. As soon as Mr. Caruso returns, he will give his passport to Pretrial Services.

If the Court approves these modifications, Mr. Caruso will provide his itinerary to Pretrial Services.

We thank the court for its consideration of this request.

Respectfully submitted,



Marc Agnifilo

cc: Counsel for the Government (via ECF)  
Pretrial Services Officer Jessica Aguilar-Adan (via email)